

**NORTH DAKOTA NETWORK COMPANY
PO BOX 2027
MINOT, NORTH DAKOTA 58207**

April 9, 2003

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

**Re: CC Docket No. 94-102
Ninth Quarterly TTY Implementation Report
BTA299 D - Minot, ND
BTA299F - Minot, ND**

Dear Ms. Dortch:

North Dakota Network Co. ("NDNC") hereby submits its April 2003 quarterly report on implementation of Text Telephone Device ("TTY") access to 911 over its digital wireless network, pursuant to the Commission's *Order* released on June 28, 2002, in CC Docket No. 94-102.

NDNC is using Nortel CDMA base stations and switching equipment in its network. Thus, NDNC is dependent on Nortel for the provision and installation of the equipment and software necessary to allow NDNC's digital wireless network to process 911 calls originating from TTY devices. However, as the Commission is aware, Nortel has discontinued support for its DMS-100 – W dual software load product line and carriers such as NDNC were forced to purchase and install a new switching platform, and to perform further software upgrades, in order to implement TTY capability.

NDNC initially sought a six-month extension (*i.e.* until December 31, 2002) to meet this requirement. However, when it became apparent that NDNC would not be able to complete the transition of its network by December 31st, the Company sought a further extension until June 30, 2003, to implement full TTY capability. The Commission has not yet acted upon NDNC's request, however, it is consistent with the terms of an extension that the Commission granted to another small wireless carrier faced with the same technical dilemma.¹

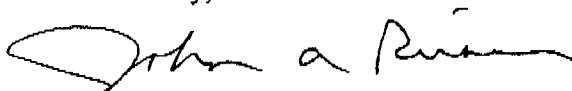
¹ In particular, the FCC granted a one-year extension of the TTY capability deadline (*i.e.*, until June 30, 2003) to SpectraCom, Inc. d/b/a PYXIS. See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, *Order*, DA 02-1540 (*rel.*, June 28, 2002).

As of April 2003, NDNC has completed the following tasks as it endeavors to bring its system into compliance with the Commission's TTY rules:

1. The building/area construction and wall destruction is 100% complete.
2. Two additional Halon tanks and additional smoke detection equipment have been installed within the new area.
3. An 800 amp commercial power breaker panel has been installed to support two new air conditioning units.
4. Two new 30,000 BTU air conditioners as well two new cooling units have been installed to replace the existing 20,000 BTU units.
5. A new backup generator has been installed to supply backup power in case of a commercial power outage.
6. A new steel superstructure and cable rack has been installed to connect the new wireless switch area to the wireline switch area.
7. New larger battery strings have been installed to accommodate the additional load of the wireless switch.
8. Additional DC power rectification has been added to accommodate the additional load of the wireless switch.
9. The main DC power distribution panel has been upgraded to accommodate four additional circuit breakers that are needed for the new wireless switch.
10. A new DMS-MTX switch has been installed and powered up.
11. The wireless Base Station Controller has been installed and powered up.
12. Testing of the DMS-MTX switch has been completed.
13. Testing of the wireless Base Stations Controller has been completed.
14. Testing of the MTX09 software load and feature set for the DMS-MTX switch has been completed.
15. Testing of the NBSS 9.0.6 software load and feature set for the Base Station Controller and Base Station Manager has been completed.
16. Transitioned wireless traffic from the DMS-100w to the new DMS-MTX.
17. Added enhanced vocoders to the new Base Station Controller.
18. Upgraded the DMS-MTX switch to MTX10 software load.
19. Removed the wireless load from the DMS-100w to make it a DMS-100 and upgraded the DMS-100 to the LEC15 software load.

Since filing its most recent quarterly TTY status report in January of 2003, NDNC has determined that it does not need to add the 250 software load to its switch in order to provide TTY capability. The Company is currently testing the TTY solution that is in its switch as a result of the MTX10 software upgrade, and it has begun selling five different wireless handsets that are TTY compliant. NDNC anticipates that its network will have full TTY capability by June 30, 2003. We will notify the Commission once we have completed this process.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Reiser". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John A. Reiser
Chief Operations Officer
North Dakota Network Co.

**North Dakota Network Co.
E911 TTY Device Capability Report as of April 2003**

Development Activities

1. **Network Infrastructure Software Development** – We are continuing to work closely with our network vendor, Nortel Networks (“Nortel”), in the implementation of a new wireless switch. Installation of MTX 10.0 switch software (which will provide TTY capability) is now complete. NDNC did not participate in the development of this Nortel software product.
2. **Handset Development and Testing Plans** – NDNC has begin selling five different types of handsets that manufacturers have indicated are TTY compliant.
3. **Beta Testing and Lab Testing** – NDNC is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. NDNC will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer’s specifications.
4. **Release and General Availability to Carriers of Network Infrastructure Software** – For further information about the initial release and general availability dates for Nortel’s TTY network infrastructure software, we respectfully refer the Commission to Nortel’s filings in CC Docket 94-102 through the TTY Forum.
5. **Availability to Carriers of Full Digital Acceptance Test Units** – See Item #2, above.
6. **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – As noted above, NDNC is a small carrier and it depends on its network and handset vendors for the development and testing of a digital wireless solution that is compatible with enhanced TTY.

Testing and Deployment Activities

7. **Carrier Coordination of Testing with PSAP** – NDNC will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
8. **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – We are currently testing the TTY solution that is now part of our switch as a result of upgrading to the MTX 10.0 software load.
9. **Retail Availability of Necessary Consumer Equipment** – As noted above, NDNC has begin selling five different types of handsets that manufacturers have indicated are TTY compliant.
10. **Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. We are currently offering TTY compliant handsets in all of our retail locations.